

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-40 (JRT/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) HARSHKUMAR RAMANLAL PATEL

a/k/a "Dirty Harry,"

a/k/a Harry Patel,

a/k/a Param Singh,

a/k/a Haresh Rameshlal Patel,

a/k/a Harshkumar Singh Patel, and

(2) STEVE ANTHONY SHAND,

Defendants.

**SECOND SUPERSEDING  
INDICTMENT**

8 U.S.C. § 1324(a)(1)(A)(i)

8 U.S.C. § 1324(a)(1)(A)(ii)

8 U.S.C. § 1324(a)(1)(A)(v)(I)

8 U.S.C. § 1324(a)(1)(B)(i)

8 U.S.C. § 1324(a)(1)(B)(iii)

8 U.S.C. § 1324(a)(1)(A)(v)(II)

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT ONE**

Conspiracy to Bring Aliens to the United States Causing Serious Bodily  
Injury and Placing Lives in Jeopardy

From on or about December 7, 2021 through January 19, 2022, in the  
District of Minnesota and elsewhere, the defendants,

**HARSHKUMAR RAMANLAL PATEL**

**a/k/a "Dirty Harry,"**

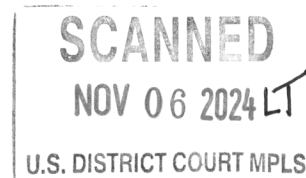
**a/k/a Harry Patel,**

**a/k/a Param Singh,**

**a/k/a Haresh Rameshlal Patel,**

**a/k/a Harshkumar Singh Patel, and**

**STEVE ANTHONY SHAND,**



United States v. Harshkumar Ramanlal Patel, et al.Criminal No. 22-40 (JRT/LIB)

did knowingly and intentionally combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury to commit the following offense against the United States: to bring aliens to the United States at a place other than a designated port of entry and a place other than as designated by the Commissioner, knowing that such persons are aliens, regardless of whether such aliens had received prior official authorization to come to, enter, and reside in the United States and regardless of any future official action which may be taken in respect to such aliens, causing serious bodily injury to and placing in jeopardy the life of an alien during and in relation to the offense, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(iii).

**COUNT TWO**

Conspiracy to Transport Aliens Causing Serious Bodily Injury and Placing  
Lives in Jeopardy

From on or about December 7, 2021 through January 19, 2022, in the  
District of Minnesota and elsewhere, the defendants,

**HARSHKUMAR RAMANLAL PATEL**  
**a/k/a “Dirty Harry,”**  
**a/k/a Harry Patel,**  
**a/k/a Param Singh,**  
**a/k/a Haresh Rameshlal Patel,**  
**a/k/a Harshkumar Singh Patel, and**  
**STEVE ANTHONY SHAND,**

United States v. Harshkumar Ramanlal Patel, et al.Criminal No. 22–40 (JRT/LIB)

did knowingly and intentionally combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit the following offense against the United States: to transport and move within the United States by means of transportation and otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact that said aliens came to, entered, and remained in the United States in violation of law, in furtherance of such violation of law, causing serious bodily injury to and placing in jeopardy the life of an alien during and in relation to the offense, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(iii).

**COUNT THREE**

Attempted Transportation of Aliens for the Purpose of Commercial  
Advantage and Private Financial Gain

On or about January 19, 2022, in the District of Minnesota and elsewhere, the defendants,

**HARSHKUMAR RAMANLAL PATEL**  
**a/k/a “Dirty Harry,”**  
**a/k/a Harry Patel,**  
**a/k/a Param Singh,**  
**a/k/a Haresh Rameshlal Patel,**  
**a/k/a Harshkumar Singh Patel, and**  
**STEVE ANTHONY SHAND,**

knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, attempted to

United States v. Harshkumar Ramanlal Patel, et al.Criminal No. 22–40 (JRT/LIB)

transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law, for purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

**COUNT FOUR**

Aiding and Abetting the Attempted Transportation of Aliens for the Purpose  
of Commercial Advantage and Private Financial Gain

On or about January 19, 2022, in the District of Minnesota and elsewhere, the defendants,

**HARSHKUMAR RAMANLAL PATEL**  
**a/k/a “Dirty Harry,”**  
**a/k/a Harry Patel,**  
**a/k/a Param Singh,**  
**a/k/a Haresh Rameshlal Patel,**  
**a/k/a Harshkumar Singh Patel, and**  
**STEVE ANTHONY SHAND,**

aided and abetted by each other and others known and unknown to the Grand Jury, knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, attempted to transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law, for purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(i).



**FORFEITURE ALLEGATIONS**

Counts 1 through 4 of this Second Superseding Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(6).

Upon conviction of the offenses in Counts 1 through 4 of this Second Superseding Indictment, the Defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(6):

(A) Any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and

(B) Any property, real or personal –

- i. That constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; or
- ii. That is used to facilitate, or is intended to facilitate, the commission of the offense.

The property to be forfeited includes, but is not limited to, the following: two black-colored Samsung cellular telephones bearing IMEI numbers 359011830852004 and 350336260884618 and one blue-colored Apple iPhone bearing IMEI number 353869220320890.

United States v. Harshkumar Ramanlal Patel, et al.

Criminal No. 22–40 (JRT/LIB)

If any of the above-described forfeitable property is unavailable, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON